

Dori Cash

From: Bob Hill
Sent: Friday, May 20, 2005 3:53 PM
To: 'Geoffrey W.Veith'
Cc: Natalie M. Ippolito (E-mail); David L. Baumberger (E-mail); James F. Bailey Jr. (E-mail); Victoria K. Petrone (E-mail)
Subject: RE: Proposed dates for Scheduling Order in Factory Mutual v. East Coast

Geoff: when do you propose to answer our interrogatories? June 25th? I would think you'd have them ready as they've been with you for a while. I don't want to get answers on the eve of close of written discovery as I'm sure we'll have questions and potential issues with them. Do your documents include Client Logic documents or are you claiming that FM doesn't have them. we have tried to get them and Client Logic isn't producing them. We don't know what you've deposited in Philadelphia.

Let me hear from you on this. I can't commit to this schedule until I know where we are on this. I am not responsible for the delay, and don't want to be prejudiced by it.
thanks. bob

-----Original Message-----

From: Geoffrey W.Veith [mailto:gwg@rmtllc.com]
Sent: Friday, May 20, 2005 2:02 PM
To: 'Baumberger, David'; Bob Hill; Dana Ostrovsky; 'James F. Bailey Jr. '; Natalie M. Ippolito; Ron Pingitore; Steve Gerber; Vicky Petrone
Subject: Proposed dates for Scheduling Order in Factory Mutual v. East Coast
Importance: High

Dear Counsel,

After communicating with counsel and reviewing the draft proposed scheduling order submitted by Mr. Hill, I am offering the following dates for your consideration:

- 1.Date f or Rule 26 Disclosures and pleadings, answers and cross claims: June 3, 2005
- 2.Date f or joinder of all parties and amendment of pleadings: June 30
- 3.Written Discovery to be completed by June 25
- 4.Plaintiff's expert reports due by July 15
- 5.Defendants' expert reports due by August 31
- 6.Expert depositions, if any, and all remaining discovery completed by October 31
- 7.All case dispositive motions due by November 30

These dates are what I understand is agreeable to counsel in the related *Federal* and *Millers* actions. Since the Factory Mutual and Hartford action arises out of the same collapse and involves the same transaction and parties as involved in the *Federal* and *Millers* actions, it makes sense to continue our current practice of scheduling and taking discovery simultaneously in all three actions until there is a formal consolidation.

I have agreed to use the same liability experts as retained by Millers and Federal. The initial disclosure documents for Factory Mutual and Hartford are available as indicated in my emails and facsimiles of yesterday (Reliable Copy Service, Philadelphia).

Please let me know if you have any comments, questions or suggestions.

6/27/2005

Regards,

Geoffrey W. Veith
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